

BURSOR & FISHER, P.A.
Neal Deckant (State Bar No. 322946)
1990 North California Blvd., 9th Floor
Walnut Creek, CA 94596
Telephone: (925) 300-4455
Facsimile: (925) 407-2700
E-mail: ndeckant@bursor.com

Attorneys for Plaintiffs

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

IN RE META PIXEL TAX FILINGS CASES

Master File No. 5:22-cv-07557-PCP (VKD)

This document relates to:

**DECLARATION OF NEAL J. DECKANT
IN SUPPORT OF MOTION TO SEAL**

All actions

The Honorable P. Casey Pitts
Courtroom 8, 4th Floor

1 I, Neal J. Deckant declare as follows:

2 1. I am an attorney at law licensed to practice in the State of California. I am also a
3 member of the bar of this Court and a partner at Bursor & Fisher, P.A., counsel of record for
4 Plaintiffs. I have personal knowledge of the facts set forth in this declaration, and, if called as a
5 witness, could and would competently testify thereto under oath.

6 2. Defendant produced certain documents containing information that it designated as
7 either Confidential or Highly Confidential – Attorney’s Eyes Only.

8 3. Some of the aforementioned documents or deposition testimony is being submitted
9 in support of Plaintiffs’ concurrently filed Notice of Motion and Motion for Class Certification. As
10 to documents designed by Defendant or third parties, Plaintiffs submit this request only to comply
11 with their obligations under Local Rule 79-5 and the protective order issued in the case, and
12 Plaintiffs take no position at this time on the propriety of other parties’ confidentiality designations,
13 or whether they meet the compelling reasons test for retaining confidentiality. As to Plaintiffs’
14 expert reports, the reports cite information throughout designated as either Confidential or Highly
15 Confidential – Attorney’s Eyes Only by Defendant. Plaintiffs also designate portions of their
16 deposition transcripts revealing personal information (e.g., address, phone number, email, zip code,
17 financial information) as Confidential or Highly Confidential – Attorney’s Eyes Only.

18 4. Plaintiffs wish to file the following portions of the Notice of Motion and Motion for
19 Class Certification under seal:

- 20 • Page 1, line 7, and 9-12.
- 21 • Page 2, line 12 and 21-25.
- 22 • Page 3, line 4, 8-14, 23-24, and 26-28.
- 23 • Page 4, line 2, 4, and 12-26.
- 24 • Page 5, line 6-13, and 16-17.
- 25 • Page 13, line 21-22, 24, and 26-28.
- 26 • Page 14, line 1-3 and 10-11.
- 27 • Page 17, line 25.
- 28 • Page 18, line 1-2.

1 5. Plaintiffs wish to file the following portions of Exhibit 13: Excerpts of Meta's
2 30(b)(6) witness Amlesh Jayakumar under seal:

- 3 • Page 19, line 6.
- 4 • Page 22, line 6-7.
- 5 • Page 43, line 23-25.
- 6 • Page 44, line 1-2 and 5-6.
- 7 • Page 47, line 3-5 and 7-8.
- 8 • Page 49, line 12-20 and 25.
- 9 • Page 50, line 2, 7-10, 14-16, and 23-24.
- 10 • Page 51, line 1-6, 10-15, and 19-23.
- 11 • Page 52, line 1-3, 6-17, and 19-21.
- 12 • Page 55, line 11-14.
- 13 • Page 56, line 10-11.
- 14 • Page 91, line 7, 13, and 21.
- 15 • Page 100, line 1, 16-19, 22, and 24.
- 16 • Page 101, line 1-5, 8, 11-16, and 19.
- 17 • Page 102, line 5-10, 13-20, and 24-25.
- 18 • Page 103, line 1, 5-8, and 21.
- 19 • Page 104, line 4-7, 9, and 14-17.
- 20 • Page 106, line 5, 13-21, and 23-24.
- 21 • Page 107, line 2, 5-7, and 16-18.
- 22 • Page 108, line 7-16, and 24-25.
- 23 • Page 109, line 1-11, 16, and 20-24.
- 24 • Page 110, line 2-3, 6-11, 13, 16-17, and 22-25.
- 25 • Page 111, line 1-4, 7-8, and 17-24.
- 26 • Page 112, line 1-2, 4-7, 11-12, and 16-24.
- 27 • Page 113, line 3-7, 9-13, and 15-25.
- 28 • Page 114, line 1-7, 10-12, 14-17, and 20-25.

- Page 115, line 1-9, 12, and 15-25.
- Page 116, line 4-8.
- Page 117, line 1-6, 10, 13-17, and 19-25.
- Page 118, line 5-14 and 17-23.
- Page 119, line 5, 7-8, 11, 14, and 16-20.
- Page 127, line 1-5, 9-13, 17, and 23-25.
- Page 128, line 1-2, 6, and 8-13.
- Page 129, line 5-6, 12-21, and 24.
- Page 130, line 1-4, 6-11, 13-14, 16-19, and 21-22.
- Page 131, line 3-6, 10, 14, 17-21, and 23.
- Page 132, line 3, 7-10, 12, 14-17, 19, 22, and 24-25.
- Page 149, line 20 and 23-25.
- Page 150, line 1, 5-6, 18-19, and 24-25.
- Page 151, line 1-2, 7-9, and 14-15.
- Page 155, line 14-15 and 23-24.
- Page 156, line 8-9 and 14-20.
- Page 157, line 4-8, 10-13, 18-21, and 25.
- Page 158, line 4, 6, 10, 13-17, and 19.
- Page 159, line 3-6, 10, 14-20, and 23-25.
- Page 160, line 1-8, 10-16, 18-19, and 21-25.
- Page 173, line 1-2 and 4-9.
- Page 174, line 23-24.
- Page 175, line 2-3, 5-7, 10-11, and 14.
- Page 202, line 24-25.
- Page 203, line 1-6.
- Page 204, line 9-13 and 23.
- Page 205, line 2, 4-5, 8-11, 17, and 23-24.
- Page 206, line 18-22 and 24-25.

- Page 208, line 6-14 and 21-25.
- Page 209, line 1-3.

6. Meta and/or Plaintiffs designated portions of the documents listed below as confidential pursuant to the protective order in this case, and Plaintiffs therefore wish to file the following Exhibits entirely under seal:

- Exhibit 14: PIXEL_TAX000022472-73
- Exhibit 15: PIXEL_TAX000023123-25
- Exhibit 16: PIXEL_TAX000003585
- Exhibit 17: PIXEL_TAX000003585
- Exhibit 18: PIXEL_TAX0000023328
- Exhibit 19: Excerpts of Meta's 30(b)(6) witness Amlesh Jayakumar in the related matter *In re Meta Healthcare Litig.*, N.D. Cal. Case No. 3:22-cv-3580-WHO, taken on May 21, 2025
- Exhibit 20: PIXEL_TAX0000052702-704
- Exhibit 21: PIXEL_TAX0000052648
- Exhibit 22: PIXEL_TAX000036169
- Exhibit 23: PIXEL_TAX000023047
- Exhibit 24: PIXEL_TAX000023180-84
- Exhibit 25: PIXEL_TAX000004297-98
- Exhibit 26: PIXEL_TAX000058899-905
- Exhibit 27: Expert Report of Colin Weir
- Exhibit 28: Expert Report of Robert Zeidman

I declare under penalty of perjury under the laws of the United States and the State of California that the foregoing is true and correct. Executed on August 18, 2025.

/s/ Neal J. Deckant
Neal J. Deckant